THE CITY OF NEW YORK

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June 2, 2023

BY ECF
Honorable Eric R. Komitee
United States Courthouse
Eastern District of New York
225 Cadman Plaza East, Courtroom 6G - North
Brooklyn, New York 11201

Re: Charles, et al. v. City of New York, et al., Docket No. 23-cv-03108 (ERK)
(CLP)

Dear Judge Komitee:

I am an attorney in the office of Sylvia Hinds-Radix, Corporation Counsel of the City of New York, counsel for Defendant the City of New York ("City Defendant"). The Complaint was served on the City Defendant on or around May 16, 2023, thus making the answer due on June 6, 2023. I write to respectfully request an extension of time to answer or otherwise respond to the Complaint to July 21, 2023. This is the City Defendant's first request for an extension. Plaintiffs' counsel has indicated that plaintiffs consent to the City Defendants' request. This extension of time does not affect any other scheduled dates.

The City Defendants seek an enlargement of time to obtain the information necessary to respond to the Complaint. In the Complaint, plaintiffs allege, inter alia, that the City's Open Streets Program restricts their access to public street services and to vehicular traffic in violation of the Americans with Disabilities Act, the Rehabilitation Act, and the New York State and New York City Human Rights Law. In keeping with this Office's obligations under Rule 11 of the Federal Rules of Civil Procedure, we need additional time to investigate the allegations of the Complaint and confer with various client contacts.

For the foregoing reasons, we respectfully request that the City Defendant's time to answer or otherwise respond to the Complaint be extended to July 21, 2023.

Thank you for your consideration herein.

Respectfully submitted,

/s/ Adam M. Moss
Adam M. Moss

Cc: Matthew L. Berman, Esq. (via ECF)
        Counsel for Plaintiffs